

Zenith Ward, WSB #7-4584  
Buchhammer & Ward, P.C.  
1821 Logan Avenue  
P.O. Box 568  
Cheyenne, WY 82003-0568  
(307) 634-2184  
fax (307) 634-2199  
[zsw@wyoming.com](mailto:zsw@wyoming.com)

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING

CARLIE SHERMAN, ANNA GOZUN, )  
AMANDA NASH, and JOHN DOE on behalf )  
of themselves and all similarly situated )  
persons, )  
Plaintiffs, )  
vs. ) Civil Action No. 20-CV-215-S  
TRINITY TEEN SOLUTIONS, INC., a )  
Wyoming corporation; TRIANGLE CROSS )  
RANCH, LLC, a Wyoming limited liability )  
corporation; MONKS OF THE MOST )  
BLESSED VIRGIN MARY OF MOUNT )  
CARMEL, d/b/a MYSTIC MONK COFFEE, )  
a Wyoming corporation; GERALD E. )  
SCHNEIDER; MICHAELEEN P. SCHNEIDER; )  
ANGELA C. WOODWARD; JERRY D. )  
WOODWARD; DANIEL SCHNEIDER; )  
MATHEW SCHNEIDER; MARK SCHNEIDER )  
KARA WOODWARD; KYLE WOODWARD )  
THOMAS GEORGE; JUDITH D. JEFFRIS; )  
DALLY-UP, LLC, a Wyoming limited liability )  
corporation; ROCK CREEK RANCH, INC. )  
A Delaware corporation, DIOCESE OF )  
CHEYENNE, a Wyoming corporation; and the )  
SOCIETY OF OUR LADY OF THE MOST )  
HOLY TRINITY, a Texas corporation; and )  
NEW MOUNT CARMEL FOUNDATION, INC., )  
a Wyoming corporation, )  
Defendants. )

**DEFENDANTS JUDITH D. JEFFERIS AND ROCK CREEK RANCH INC.'S MOTION  
TO DISMISS FIRST AMENDED COMPLAINT**

COMES NOW Defendants Judith D. Jefferis and Rock Creek Ranch, Inc., through their attorneys Buchhammer & Ward, P.C., and hereby move this Court, pursuant to Fed.

R. Civ. P. 12(b)(6) to dismiss Plaintiff's Amended Complaint with prejudice as it pertains to Judith D. Jefferis and Rock Creek Ranch, Inc. for failure to state a claim upon which relief may be granted. In support of this Motion, Judith D. Jefferis and Rock Creek Ranch, Inc. hereby incorporate their Defendant Judith D. Jefferis and Rock Creek Ranch, Inc.'s Brief in Support of Motion to Dismiss First Amended Complaint pursuant to Local Rule 7.1(b)(2)(a).

DATED this 26<sup>th</sup> day of March, 2021

Judith D. Jeffris and Rock Creek Ranch, Inc.,  
Defendants.

By:

Zenith S. Ward, WSB # 7-4584  
Buchhammer & Ward, P.C.  
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[zsw@wyoming.com](mailto:zsw@wyoming.com)

#### CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all parties per the CM/ECF electronic service of the Court, this 26<sup>th</sup> day of March, 2021.

Zenith S. Ward